



HON. SYLVIA O. HINDS-RADIX  
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March 17, 2022

**VIA ECF**

Honorable Andrew L. Carter  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: March 18, 2022

MEMO ENDORSED

Re: *K.A., et al. v. City of New York, et al.* 18-cv-3858 (ALC)(SLC)

Dear Judge Carter:

I am an Assistant Corporation Counsel in the office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action. I write to respectfully request permission to file medical records for the two putative class representatives, under seal, as exhibits to be used in support of the summary judgment motion to be filed tomorrow, March 18, 2022 (ECF No. 124)

As Your Honor is aware, Plaintiffs claim deprivations of the right to medical care while in the custody of the New York City Department of Correction between September 2017 and April 2018, violating their rights under the First, Eighth and Fourteenth amendments. Thus, medical records generated during and post that time period will be submitted as exhibits to declarations.

Therefore, pursuant to Your Honor's Individual Practices ¶ 6.C(ii), Defendants respectfully request permission to file medical records under seal, and that they be excused from filing those medical records contemporaneously with this letter motion as required by Court's standing order, 19-mc-00583, and ECF Rules & Instructions, section 6.

The parties have agreed to serve each other via email with any medical records filed under seal.

The parties respectfully request that the following attorneys have access to the sealed documents:

Phillip Hines, Esq., attorney for Plaintiffs  
Uri Nazaran, attorney for Plaintiffs  
Lorna Goodman, attorney for Defendants  
Martin Bowe, attorney for Defendants

Thank you for considering this submission.

Respectfully submitted,

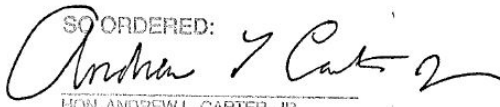
/s/

Martin Bowe

Assistant Corporation Counsel

cc: all counsel of record. (via ECF)

Application **GRANTED**.

SO ORDERED:  
  
\_\_\_\_\_  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

**Dated:** March 18, 2022